

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

JANE DOE, )  
 )  
 Plaintiff, )  
 ) Cause No.:  
 v. )  
 )  
 JEREMY STEEN, ZACHARY TUNISON, )  
 BRIAN JOHNSON, ERIC BROTHERTON, ) JURY TRIAL DEMANDED  
 and JOHN COTTLE, (in his official capacity) )  
 Defendants. )

**PLAINTIFF'S MOTION TO PROCEED UNDER A PSEUDONYM**

COMES NOW, Plaintiff by and through counsel and hereby moves the court to enter its order allowing Plaintiff to proceed under the pseudonym of "Jane Doe" in any public document and that the identity of relevant witnesses that would or could indirectly identify Plaintiff be referred to only by their relation to Plaintiff, such as, "Plaintiff's husband." Plaintiff states:

1. Plaintiff is in fear of retaliation both potentially from the defendants or general public if her identity is known.
2. Plaintiff's Constitutional right to privacy is implicated because the allegations in her complaint include her having been sexually assaulted.
3. Plaintiff's alleged damages such as emotional distress and humiliation would only be amplified and exacerbated by her identity being made public.
4. Defendants are not prejudiced by maintaining the confidentiality of Plaintiff's identity in that Defendants are aware of Plaintiff's identity.

WHEREFORE, Plaintiff requests this court issue an order to allow Plaintiff to proceed under the pseudonym Jane Doe.

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By: /s/ John D. James  
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